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8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
10			
11	MICHELLE FERRELL,	Case No. 2:24-cv-01527-APG-NJK	
12	Plaintiff,	STIPULATION AND PROPOSED ORDER TO EXTEND DISCOVERY DEADLINES	
13	V.	(FIRST REQUEST)	
14	GNLV, LLC d/b/a GOLDEN NUGGET LAS		
VEGAS HOTEL AND CASINO; DOES I-X, inclusive, and ROE CORPORATIONS I-X,			
16	inclusive,		
17	Defendants.		
18			
19	IT IS HEREBY STIPULATED AND AG	REED, between the parties and their attorneys o	
20	record, that the current discovery deadlines to b	e extended as indicated on page 3, pursuant to	
21	Local Rule 26-1(b) and 26-3.		
22	I.		
23	DISCOVERY COMI	PLETED TO DATE	
24	1. The parties have conducted the FR	CP 26.1 Early Case Conference.	
25	2. Defendant produced its Lists of Witnesses and Documents, pursuant to FRCP 26(a		
26	on August 16, 2024, disclosing approximately 34 pages.		
	3. Plaintiff produced her Lists of Witnesses and Documents pursuant to FRCP 26(a		
27 28	on September 12, 2024, disclosing approximately 300 pages.		
/X I			

1 4. Plaintiff served a Notice of Site Inspection on September 30, 2024. 5. 2 Plaintiff served a Notice of Taking Deposition of William McAlinden on September 30, 2024. 3 6. Plaintiff served an Amended Notice of Taking Deposition of William McAlinden 4 on October 23, 2024. 5 7. Plaintiff served her First Set of Interrogatories (23 total) and Requests for Production 6 of Documents (24 total) on November 18, 2024. 7 8. Defendant served a Notice of Intent to Serve Rule 45 Subpoenas to the Custodians 8 9 of Records of Plaintiff's identified medical providers on October 29, 2024. 9. Plaintiff served her Amended Notice of Site Inspection on November 8, 2024. 10 10. Defendant served a Notice of Taking Deposition of Plaintiff on November 18, 2024. 11 12 11. Defendant served a Notice of Intent to Serve Rule 45 Subpoenas to the Custodians 13 of Records of Plaintiff's identified medical providers on November 25, 2024. 12. Defendant served a Notice of IME on November 26, 2024. 14 15 13. Defendant propounded its First Set of Interrogatories (25 Interrogatories), Requests for Production of Documents (32 Requests), and Requests for Admissions (26 Requests) to Plaintiff 16 on November 25, 2024. 17 18 14. Plaintiff produced the First Supplement to her Lists of Witnesses and Documents, 19 and supplements thereto pursuant to FRCP 26(a) on November 26, 2024, disclosing approximately 20 572 pages. 15. Deposition of Plaintiff, taken on November 22, 2024. 21 22 16. Inspection of the premises. II. 23 DISCOVERY THAT REMAINS TO BE COMPLETED 24 1. Rule 35 Examination of Plaintiff currently schedule for December 16, 2024. 25 2. Deposition of Defendant GNLV, LLC 30(b)(6) witness(es). 26 3. Initial Expert Disclosure. 27 4. Rebuttal Expert Disclosure. 28

- 5. Deposition(s) of Plaintiff's treating physicians.
- 6. Deposition of other percipient witnesses.
- 7. Depositions of experts.
- 8. Issuing subpoenas to additional third-parties, including Plaintiff's medical providers (if any).
 - 9. Additional written discovery (if necessary).
- 10. Any remaining discovery the parties deem relevant and necessary as discovery continues.

III. REASONS THE PARTIES REQUEST TO EXTEND THE DISCOVERY DEADLINES

The parties respectfully submit, pursuant to Local Rule 26-3, that good cause exists for the following requested extension. This Request for an extension of time is not sought for any improper purpose other purpose of delay. Good cause exists for the following reasons: the parties have been diligently working on scheduling a Rule 35 independent medical examination of Plaintiff. The Examination is scheduled for December 16, 2024 with Dr. Sutherland; however due to the holidays his expert report will be available at least 30 days after the Examination. In addition, with the holiday season, other experts are running into issues with the current deadline. The parties therefore request a modest extension of the remaining case deadlines as outlined below to allow sufficient time for plaintiff's examination, and the preparation of the expert reports.

Extension or Modification of The Discovery Plan and Scheduling Order.

Discovery Deadline	Current Deadline	Proposed Deadline
Motion to Amend/Add Parties	November 29, 2024	November 29, 2024
Initial Expert Disclosures	December 27, 2024	January 27, 2025
All Rebuttal Expert Disclosures	January 27, 2025	February 26, 2025
Discovery Cut-Off Date	February 27, 2025	March 28, 2025
Dispositive Motions	March 31, 2025	April 30, 2025
Pretrial Order	April 30, 2025	May 30, 2025

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1	The parties represent this Stipulation is sought in good faith and not interposed for delay or		
2	any other improper purpose.		
3	DATED this 6 th day of December, 2024.	DATED this 6 th day of December, 2024.	
4	THE COTTLE FIRM	TYSON & MENDES LLP	
5	/-/ M C. H-11 1	/-/ Colffed II II	
6	/s/ Matthew G. Holland ROBERT W. COTTLE, ESQ. Nevada Bar No. 4576	/s/ Griffith H. Hayes GRIFFITH H. HAYES, ESQ. Nevada Bar No. 7374	
7	MATTHEW G. HOLLAND, ESQ. Nevada Bar No. 10370	CHRISTOPHER A. LUND NEVADA BAR NO. 12435	
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9	Attorneys for Plaintiff	Attorneys for Defendant GNLV, LLC	
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11	IT IS SO ORDERED.		
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13	UNITED STATES MAGISTRATE JUDGE		
14	December 6, 2024		
15	DATE		
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